



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

RQ-3

June 26, 2003

Glen O'Connell, Treasurer
South Carolina Republican Party
1508 Lady Street
Columbia, SC 29201

Identification Number: C00034033

Reference: Amended 30 Day Post-General Report (10/17/02-11/25/02), received
12/23/02

Dear Mr. O'Connell:

On June 4, 2003, you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your June 19, 2003 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-Your report discloses receipts totaling \$22,351 from Graham-SC Victory Committee, which is a joint fundraising committee(s) affiliated with your committee. Please be advised that a memo Schedule A must be provided to itemize your committee's share of the gross contributions received through the joint fundraiser(s). The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the calendar year, and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount. Please amend your report by providing the omitted memo schedule(s). 11 CFR §102.17(c)(8)(i)(B)

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of

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employer. (11 CFR §109.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your

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report to clarify the following description(s): "election day event ADMINISTRATION L 01", election night event ADMINISTRATION L", "event- Inv. 438 ADMINISTRATION L 0112020", events- calls inv.20020391 ADMINISTRATION L", "events ADMINISTRATION L 0112020121". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule H4 discloses payments made to credit card companies for shared federal and non-federal activity. Please be advised that these payments must identify as memo entries, the original vendors from which you have purchased an item or service regardless of the amount. Please amend your report by providing the name and mailing address of the original vendor, along with the date, amount and purpose of each expenditure. 11 CFR §104.10.

-Schedule H4 supporting Line 21(a) of the Detailed Summary Page of your Amended 30 Day Post-General Report dated 6/19/03 (pertinent portion(s) attached) still discloses \$2,559.32 in disbursements for activities on behalf of "Bush event." Your response indicates that the "[d]isbursements made for Bush event were not made on behalf of George Bush. The money raised were both federal and non-federal dollars."

If the nature of these activities did not support George Bush and were an allocable expenditure between your federal and non-federal accounts, please amend your report to clarify the purpose of these activities on Schedule H4.

An adequate response must be received at the Commission by July 16, 2003. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

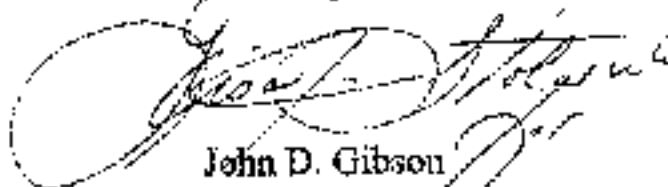
Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any

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questions related to this matter, please contact Jane Parks on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson", is written over a large, faint, circular stamp or watermark.

John D. Gibson
Assistant Staff Director
Reports Analysis Division

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2025 RELEASE UNDER E.O. 14176

DISBURSEMENT SCHEDULE H4 (FEC Form 3X)
JOINT FEDERAL/NON-FEDERAL ACTIVITY SCHEDULE

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FOR LINE 21a OF FORM 3X

NAME OF COMMITTEE (In Full)					
South Carolina Republican Party					
A. Full Name (Last, First, Middle Initial)			Type of Allocated Activity:		
Richard Quinn & Associates			<input checked="" type="checkbox"/> Admin./Voter Drive <input type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support		
Mailing Address			Event Year-To-Date		
1600 Gervais Street			760657.16		
City	State	Zip Code	Category/Type		
Columbia	SC	29201-			
Purpose/Event:			Date		
direct mail, issue advocacy ADMINISTRATION			MM / DD / YYYY 10 / 23 / 2002		
Description:					
FEDERAL SHARE		+	NON-FEDERAL SHARE		= TOTAL AMOUNT
18175.00			67525.00		76700.00
Transaction ID: H41029200218E4716					
A. Full Name (Last, First, Middle Initial)			Type of Allocated Activity:		
Kinko			<input checked="" type="checkbox"/> Admin./Voter Drive <input type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support		
Mailing Address			Event Year-To-Date		
1111 Greene St.			761130.27		
City	State	Zip Code	Category/Type		
Columbia	SC	29201-			
Purpose/Event:			Date		
bus event ADMINISTRATION L 0112120111			MM / DD / YYYY 10 / 23 / 2002		
Description:					
FEDERAL SHARE		+	NON-FEDERAL SHARE		= TOTAL AMOUNT
110.77			332.32		443.09
Transaction ID: H41028200216E4718					
A. Full Name (Last, First, Middle Initial)			Type of Allocated Activity:		
Grand Rental Station			<input checked="" type="checkbox"/> Admin./Voter Drive <input type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support		
Mailing Address			Event Year-To-Date		
P O Box 531			731609.02		
City	State	Zip Code	Category/Type		
Columbia	SC	29201-			
Purpose/Event:			Date		
bus event rental ADMINISTRATION L 0112			MM / DD / YYYY 10 / 23 / 2002		
Description:					
FEDERAL SHARE		+	NON-FEDERAL SHARE		= TOTAL AMOUNT
127.19			381.58		508.75
Transaction ID: H41029200218E4713					
SUBTOTAL of Joint Federal and Non-Federal Activity This Page					
FEDERAL SHARE		+	NON-FEDERAL SHARE		= TOTAL AMOUNT
19412.96			58238.88		77651.84
TOTAL This Period (last page for each line only)(Federal share to 21(a)(i) and non-Federal share to 21(a)(ii))					
FEDERAL SHARE					TOTAL AMOUNT
NON-FEDERAL SHARE					
TOTAL This Period for the Non-Federal Share (used for line 31 of the detailed summary page)					

DISBURSEMENT SCHEDULE H4 (FEC Form 3X)
JOINT FEDERAL/NON-FEDERAL ACTIVITY SCHEDULE

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 FOR LINE 21a OF FORM 3X

NAME OF COMMITTEE (or Full)					
South Carolina Republican Party					
A. Full Name (Last, First, Middle Initial)			Type of Allocated Activity:		
Columbia Flag & Display Co			<input checked="" type="checkbox"/> Admin./Voter Drive <input type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support		
Mailing Address			Event Year-To-Date		
1217 Broad River Rd			763216.52		
City	State	Zip Code			
Columbia	SC	29210-			
Purpose/Event:			Category/Type		
bush event ADMINISTRATION L 0112120111					
Description:			Date		
			M M / D D / Y Y Y Y 10 23 2002		
FEDERAL SHARE		+	NON-FEDERAL SHARE		= TOTAL AMOUNT
401.63			1204.87		1606.50
Transaction ID: H41029200218E4714					
A. Full Name (Last, First, Middle Initial)			Type of Allocated Activity:		
Columbia Flag & Display Co			<input checked="" type="checkbox"/> Admin./Voter Drive <input type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support		
Mailing Address			Event Year-To-Date		
1217 Broad River Rd			763410.25		
City	State	Zip Code			
Columbia	SC	29210-			
Purpose/Event:			Category/Type		
bush event ADMINISTRATION L 0112120111					
Description:			Date		
			M M / D D / Y Y Y Y 10 23 2002		
FEDERAL SHARE		+	NON-FEDERAL SHARE		= TOTAL AMOUNT
46.88			146.05		192.93
Transaction ID: H41029200219E4715					
A. Full Name (Last, First, Middle Initial)			Type of Allocated Activity:		
Heavenly Ham			<input checked="" type="checkbox"/> Admin./Voter Drive <input type="checkbox"/> Fundraising <input type="checkbox"/> Exempt <input type="checkbox"/> Direct Candidate Support		
Mailing Address			Event Year-To-Date		
P O Box 48			763725.25		
City	State	Zip Code			
Columbia	SC	29210-			
Purpose/Event:			Category/Type		
bush event ADMINISTRATION L 0112120111					
Description:			Date		
			M M / D D / Y Y Y Y 10 23 2002		
FEDERAL SHARE		+	NON-FEDERAL SHARE		= TOTAL AMOUNT
78.75			236.26		315.00
Transaction ID: H41029200218E4717					
SUBTOTAL of Joint Federal and Non-Federal Activity This Page					
FEDERAL SHARE		+	NON-FEDERAL SHARE		= TOTAL AMOUNT
529.06			1587.17		2116.23
TOTAL This Period (last page for each line only) (Federal share to 21(a)(i) and non-Federal share to 21(a)(ii))					
FEDERAL SHARE		TOTAL AMOUNT			
NON-FEDERAL SHARE					
TOTAL This Period for the Non-Federal Share (used for line 31 of the detached summary page)					

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